

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA

DELTA LOCUM TENENS, LLC, §
§
PLAINTIFF, §
§
v. § CIVIL ACTION NO. 5:17-fj-00004-R
§
CIMARRON COUNTY HEALTH §
AUTHORITY *d/b/a* CIMARRON §
MEMORIAL HOSPITAL, §
§
DEFENDANT. §

PLAINTIFF'S INTERROGATORIES IN AID OF JUDGMENT TO DEFENDANT

TO: Defendant Cimarron County Health Authority *d/b/a* Cimarron Memorial Hospital, 100 South Ellis Street, Boise City, Oklahoma 73933.

Pursuant to the Federal Rules of Civil Procedure, Plaintiff Delta Locum Tenens, LLC (“Plaintiff”) submits the following Interrogatories in Aid of Judgment (the “Interrogatories”) to Defendant Cimarron County Health Authority *d/b/a* Cimarron Memorial Hospital (“Cimarron” or “Defendant”):

I.
INSTRUCTIONS

1. The following Interrogatories should be answered separately, fully, in writing, and under oath, and the answers shall be served on counsel for Plaintiff within thirty-three (33) days from the date of service of these Interrogatories.

2. Each Interrogatory should be construed independently and answered without reference to any other Interrogatory response, unless the Interrogatory specifically refers to another Interrogatory.

3. If any of the following Interrogatories cannot be answered in full, please answer to the extent possible, specifying the reason for your inability to answer the remainder and

stating what information and knowledge you have concerning the unanswered portion. If your answers are qualified, please set forth the details of such qualification.

4. These Interrogatories are continuing in nature, and you are required to supplement your responses to these Interrogatories in accordance with your obligation under the Federal Rules of Civil Procedure.

5. When answering these Interrogatories, you are requested to furnish all information available to you, including information in the possession of your employees, attorneys, accountants, consultants, experts, investigators, agents, representatives, and any other person acting on your behalf.

6. If any Interrogatory is not answered based upon a claim of privilege, you are requested to state the claim of privilege with specificity and to provide the following information to evaluate each claim of privilege: the date of the communication or information which you claim as privileged, the subject matter thereof, the identity of the persons participating in the communication or the creation of the information or having knowledge thereof, and the identity of all persons to whom any portion of the communication or information has been disclosed.

7. If any information sought by these Interrogatories is withheld for any reason other than privilege, you shall identify the information withheld, the subject matter or the nature of the information, and the precise reason(s) as to why such information is being withheld.

II. **DEFINITIONS**

The Definitions set forth below, unless otherwise indicated, apply to all of the Interrogatories set out in Section III hereof.

1. "And" and "or" shall mean and/or.
2. "Any" and "all" shall mean any and/or all.

3. The terms "lawsuit" or "litigation" shall mean the above-captioned matter.
4. The terms "person" or "entity" shall mean any natural person, group of persons, corporation, partnership, joint venture, unincorporated association, organization, trust, governmental agency, or entity of any other kind.
5. "Identify," "identification," and "identifying" shall mean:
 - (a) with respect to an entity which is not a natural person, state the entity's full name, date and place of formation, principle place of business, and all its business addresses;
 - (b) with respect to a person state the person's full name, current address, and current telephone number;
 - (c) with respect to a document, state the title, type of document, date, author, addressee, recipients, substance of its contents, subject matter, present location, custodian, and each person who has had possession, custody or control over the original and each copy of the document;
 - (d) with respect to a statement, communication, correspondence, or representation, state the maker, recipients, date upon which and the place where the statement, communication or representation was made, persons present when made, mode of communication, subject matter or substance of the statement, communication or representation, and identification of each document referring or relating to such statement, communication or representation;
 - (e) with respect to a claim for a payment, credit, or offset that you contend Plaintiff has not allowed to you state the date, amount, and nature of every such payment, credit, or offset; and,

(f) with respect to a claim, demand or cause of action, state the nature and substance thereof, the basis thereof, the amount thereof, and the date on which each claim, demand, or cause of action accrued.

6. The terms “related to” or “relating to” shall mean constitutes, evidences, contains, embodies, comprises, reflects, identifies, states, deals with, comments on, responds to, describes, involves, or is in any way pertinent to that subject.

7. “Plaintiff” shall mean Plaintiff Delta Locum Tenens, LLC, and all of its, as applicable, agents, employees, representatives, shareholders, officers, directors, or other person(s) acting or purporting to act for or on its behalf.

8. “You,” “your,” or “Cimarron” shall mean Defendant Cimarron County Health Authority *d/b/a* Cimarron Memorial Hospital, and all of its, as applicable, agents, employees, representatives, shareholders, officers, directors, or other person(s) acting or purporting to act for or on its behalf.

9. The term “services” shall mean the services and expenses provided by Plaintiff to you which form the basis of this lawsuit, and are further described in Plaintiff’s Original Complaint.

III.
INTERROGATORIES

INTERROGATORY NO. 1: Have you furnished or exhibited a statement of your financial condition to any person or entity in the last five (5) years? If you have, for each occurrence please state-

- a. the full name and complete address of the person or entity receiving the information;
- b. the date and place the information was received; and
- c. the contents of the financial statement, copying it verbatim or, if you will do so without a court order, attaching a copy of the statement to your answers.

ANSWER:

INTERROGATORY NO. 2: For each item of personal property, including but not limited to tools, tubing, metals, equipment, inventory, livestock, boats, sporting goods, vehicles, aircraft, or stamp, coin, or other kinds of collections, regardless of location, that you now own, claim any interest in, or have title to, please state-

- a. a complete description of the item, including as applicable the year, make, model, serial number, and other permanent identification numbers;
- b. the estimated present market value of the item; and
- c. the complete address of its present location.

ANSWER:

INTERROGATORY NO. 3: Do you own any security (including but not limited to stocks and bonds) of any foreign or domestic entity or government? If so, for each such organization please state-

- a. the full name and complete address of the organization;
- b. a complete description of the security, its face value, the price you paid for it, and its present market value;
- c. the serial number of each security;
- d. the date when each security was acquired by you;
- e. how each security was acquired by you (purchase, gift, etc.);
- f. the full name and complete address of each person or entity from whom the security was acquired, regardless of the means of acquisition;
- g. the full name, complete address, and telephone number of each person or entity with whom you share ownership or control of the security; and
- h. whether you now owe any money to a person or entity for the purchase of the security.

ANSWER:

INTERROGATORY NO. 4: Do you maintain any bank accounts, including but not limited to checking accounts and savings accounts? If you do, for each account please state-

- a. the full name and complete address of the institution holding the account;
- b. where the account is located;
- c. the full name and number under which it is carried;
- d. the balance of the account five (5) calendar days before these Interrogatories were received by you;
- e. the identity of each authorized signature for the account at any time in the last five (5) years and the dates between which the signature was authorized; and
- f. the contents of your resolution establishing the account, copying the resolution verbatim or attaching a copy of it to your answers.

ANSWER:

INTERROGATORY NO. 5: For each disbursement of you in the last five (5) years that exceeded \$1,000.00, please state-

- a. the full name and complete address of the payee;
- b. the amount of the payment; and
- c. the date it was paid.

ANSWER:

INTERROGATORY NO. 6: Do you have any money on deposit in a name other than your own? If you do, for each account please state-

- a. the type of account;
- b. where the account is maintained;
- c. the full name and number under which the account is maintained;
- d. the full name and complete address of the institution holding the deposits;

- e. the balance of the account five (5) calendar days before these Interrogatories were received by you; and
- f. the amount or portion of the account that belongs to you.

ANSWER:

INTERROGATORY NO. 7: Do you have check-writing authority on any account not already described in your answers? If you do, for each account please state-

- a. where the account is maintained;
- b. the full name and number under which the account is maintained;
- c. the full name and complete address of the institution holding the account;
- d. the full name and complete address for each person or entity owning or claiming an interest in it; and
- e. the reason for your authority to write checks on the account.

ANSWER:

INTERROGATORY NO. 8: Have you sold or assigned any account receivable and set up any reserve fund for your benefit out of that account receivable? If so, for each account please state-

- a. the full name of the account;
- b. the conditions for receiving reserves;
- c. the full name and complete address of each person or entity holding the funds; and
- d. the amount of funds.

ANSWER:

INTERROGATORY NO. 9: Do you presently owe more than \$500.00 to any creditor? If you do, for each such debt please state-

- a. the creditor's full name and complete address;

- b. the amount of the debt owed by you;
- c. the date the debt was incurred;
- d. the payment or other consideration you received in exchange for the debt; and
- e. a description of the security given by you to secure the debt.

ANSWER:

INTERROGATORY NO. 10: Is there any judgment against you that is unpaid? If there is, for each unpaid judgment please state-

- a. the date of the judgment;
- b. its amount and how much remains unpaid;
- c. the name of the party having the judgment against you;
- d. the name of the present holder of the judgment if different from the Plaintiff;
- e. the name, number, and location of the court in which the judgment was obtained; and
- f. the cause number of the judgment.

ANSWER:

INTERROGATORY NO. 11: Do you claim that any real or personal property, tangible or intangible, is protected from the claims of your creditors? If you do, for each piece of property so claimed, please state-

- a. the legal and common descriptions of the property;
- b. the estimated value of the property;
- c. the reason for claiming that it is exempt; and
- d. the complete address of the property's location.

ANSWER:

INTERROGATORY NO. 12: In the last five (5) years, have you furnished a financial statement to any person or entity? If you have, for each financial statement please state-

- a. why it was prepared;
- b. the full name and complete address of each person or entity to whom it was furnished;
- c. the date it was furnished;
- d. the full name and complete address of the person or entity now owning each asset shown on the statement; and
- e. the contents of the statement, copying it verbatim or, if you will do so without a court order, attaching a copy of the statement to your answers.

ANSWER:

INTERROGATORY NO. 13: What is the full legal name of the person answering these Interrogatories for you? Also please state-

- a. your date and place of birth;
- b. your Social Security number;
- c. the license number and state of issuance of each driver's license in any of your names;
- d. your complete residential address and telephone number; and
- e. your complete business address and telephone number.

ANSWER:

INTERROGATORY NO. 14: Please state your full legal name and each other name by which you have ever been known.

ANSWER:

INTERROGATORY NO. 15: Have you ever used a trade name or assumed name? If you have, for each name please state-

- a. the name used; and
- b. the date and place of filing of each assumed name certificate.

ANSWER:

INTERROGATORY NO. 16: Please state the full name and complete address of each registered agent for service designated by you in any state.

ANSWER:

INTERROGATORY NO. 17: On what date were you formed?

ANSWER:

INTERROGATORY NO. 18: Please name each state in which you do business.

ANSWER:

INTERROGATORY NO. 19: Please state your present complete address (street address, city, county, state, zip code) and each telephone number, including area code, at that address. Also, please state each post office box address used.

ANSWER:

INTERROGATORY NO. 20: Please state the complete address (street address, city, county, state, zip code) of each place in which you are doing business or have done business within the last five (5) years.

ANSWER:

INTERROGATORY NO. 21: For each person who is a member of you or has been a member at any time in the last five (5) years, please state-

- a. the member's full name;
- b. his or her complete present address;
- c. whether the person is now a member and, if no, when the membership ended; and
- d. the full name and complete address of each business in which the member owns an interest, with which the member is associated in any way, or by which the member is employed.

ANSWER:

INTERROGATORY NO. 22: Has any ownership interest of you been sold? If so, for each person or entity that has bought ownership interest please state-

- a. the full name and complete address of the buyer;
- b. the ownership interest purchased;
- c. the amount paid for such ownership interest; and
- d. the date of the purchase.

ANSWER:

INTERROGATORY NO. 23: What is the nature of each business in which you have engaged in at any time in the last five (5) years?

ANSWER:

INTERROGATORY NO. 24: For each person or entity now owning, claiming any interest, in, or having title to any other security of you, please state-

- a. the full name of the person or entity;
- b. the complete address of the person or entity;
- c. a complete description of the security;
- d. the percentage of ownership interest involved;
- e. the face value of each ownership interest;
- f. the present market value of each ownership interest;
- g. the payment or other consideration received by you for the security; and
- h. the date the security was issued.

ANSWER:

INTERROGATORY NO. 25: Please state the full name and complete address of each institution or business organization with which you have engaged in any joint venture or partnership at any time within the last five (5) years and the nature of your involvement.

ANSWER:

INTERROGATORY NO. 26: Do you have an ownership interest in, option to purchase, contract to sell, leasehold in, or other interest in any real property? If so, for each property please state-

- a. the legal and common descriptions and the location of the property;
- b. the size of the property;
- c. a description of every structure or other improvement on the property;
- d. the full name and complete address of each person or other entity having an interest in it;
- e. the ownership of the property as stated in the title documents and the location of each document;
- f. the present value of your equity interest in the property;
- g. the present market value of the property; and
- h. the amount paid for the property.

ANSWER:

INTERROGATORY NO. 27: Is any real or personal property that you now own, claim any interest in, or have title to now encumbered by a mortgage, security interest, or other kind of lien? If so, for each item of encumbered property please state-

- a. a complete description of the item, including as applicable the year, make, model, serial number, and other permanent identification numbers;
- b. the nature of the encumbrance;
- c. the date the property was encumbered;
- d. the full name and complete address of each person or entity holding the encumbrance;
- e. the payment or other consideration received for the encumbrance; and
- f. the full name and complete address of each person or entity who paid the consideration.

ANSWER:

INTERROGATORY NO. 28: Do you now own, claim any interest in, or have title to any personal property now pledged as security for a debt? If so, for each item please state-

- a. a complete description of the item, including as applicable the year, make, model, serial number, and other permanent identification numbers;
- b. the amount of the debt the property was pledged to secure and the amount of the debt;
- c. how the debt was incurred and when payment is due;
- d. the date the debt was incurred;
- e. the full name and complete address of the person or entity to whom the property is pledged; and
- f. the date when possession of it was transferred to the person or entity to whom it is pledged.

ANSWER:

INTERROGATORY NO. 29: Do you have any ownership interest in any other business? If so, for each business please state-

- a. the full name of the business;
- b. the complete address of the principal place of business or general office of the business;
- c. the complete address of each place at which it conducts business;
- d. the type of business it conducts;
- e. the form of business organization (for example, corporation, partnership);
- f. the date you acquired your interest in the business;
- g. the present value of your interest in the business and your percentage of the total value of the business;
- h. your duties in the business;
- i. the full name and complete address of each partner, officer, and director of the business; and

- j. the full name and complete address of each bank at which the business maintains any type of checking or deposit account or from which the business has borrowed money.

ANSWER:

INTERROGATORY NO. 30: Is any stock, bond, or other security that you own pledged, mortgaged, or subject to an option to repurchase by any person or entity? If so, for each such interest held by another please state-

- a. the full name and complete address of the person or entity having the interest in your securities;
- b. the date the interest was acquired; and
- c. a complete description of the interest.

ANSWER:

INTERROGATORY NO. 31: Is any stock, bond, or other security that you own held by a broker in the name of you or of any person or other entity? If so, for each security please state-

- a. the full name and complete address of the broker;
- b. a complete description of the security;
- c. the present market value of the security;
- d. the date the broker acquired possession of the security; and
- e. the balance of your account with the broker five (5) calendar days before these Interrogatories were received by you.

ANSWER:

INTERROGATORY NO. 32: Do you maintain a pension plan, profit-sharing plan, or other entity or trust in which you or any employee, officer, or member of you has an interest? If so, for each plan please state-

- a. where it is located;
- b. the full name and complete address of the institution holding the account;

- c. the full name and number under which the account is maintained; and
- d. the balance of the account five (5) calendar days before these Interrogatories were received by you.

ANSWER:

INTERROGATORY NO. 33: Do you hold any real or personal property in trust for any person or entity? If you do, for each trust please state-

- a. a complete description of the property held in trust;
- b. the complete address of the property's location;
- c. the date the trust was created;
- d. the source of the trust assets; and
- e. the full name and complete address of each beneficiary who has an interest in the trust.

ANSWER:

INTERROGATORY NO. 34: In the last five (5) years, have you created or contributed to any trust for the benefit of others? If so, for each trust please state-

- a. the date the trust was created;
- b. a complete description of the property contributed to the trust by you and the property's present market value;
- c. each trustee's full name and complete address;
- d. each beneficiary's full name and complete address; and
- e. whether any of the beneficiaries are related to each other and, if they are, the full names of the related beneficiaries and the nature of their relationship.

ANSWER:

INTERROGATORY NO. 35: Does any person or entity hold any real or personal property in trust for you? If so, for each trust please state-

- a. a complete description of the property held in trust;
- b. the complete address of the property's location;
- c. the date the trust was created;
- d. the source of the trust assets; and
- e. the full name and complete address of each beneficiary who has an interest in the trust.

ANSWER:

INTERROGATORY NO. 36: Are you a beneficiary under the terms of any will? If so, for each will please state-

- a. a full name of the testator;
- b. a complete description of the property given to you under the will;
- c. the name, number, and location of the court administering the estate;
- d. if the will has not been offered for probate, the full name and complete address of the person who now has possession of the will;
- e. whether you have received any advancement from the testator or personal representative and, if so, the amount of each advancement received; and
- f. whether you have renounced any bequest or legacy and, if so, the date of each renunciation and the full name and complete address of each person or entity whose interest in the estate was enhanced as a result of the renunciation.

ANSWER:

INTERROGATORY NO. 37: Do you have the right to enter any depository, including but not limited to safes, vaults, and safe-deposit boxes, for securities, cash, or other valuables? If so, for each depository please state-

- a. the full name and complete address of each person or entity to whom the depository is rented;

- b. the full name and complete address of the bank or other institution in which the depository is located;
- c. the full name and complete address of each person having access to the depository;
- d. a complete description of the property contained in the depository on the date you are answering these Interrogatories;
- e. the complete contents of each inventory, copying the inventories verbatim or, if you will do so without a court order, attaching copies of them to your answers; and
- f. the date on which any person last opened the depository on behalf of you.

ANSWER:

INTERROGATORY NO. 38: Has anything been removed from any above-mentioned depository during the last twelve (12) months? If it has, for each thing removed please state-

- a. a complete description of the property removed;
- b. the date it was removed;
- c. why it was removed;
- d. the full name and complete address of each person who removed it; and
- e. the full name and complete address of each person or entity now having the property in its possession.

ANSWER:

INTERROGATORY NO. 39: Do you own any interest in a patent or copyright? If so, for each interest please state-

- a. a complete description of the patent or copyright;
- b. its registration number;
- c. the full name and complete address of each person sharing an interest in the patent or copyright;
- d. the extent of your share, expressed as a fraction or percentage; and

- e. the annual income derived by you from the patent or copyright.

ANSWER:

INTERROGATORY NO. 40: At any time in the past five (5) years have you paid a premium on any life insurance policy? If you have, for each policy please state-

- a. the full name, complete address, and telephone number of the issuing company;
- b. the number of the policy;
- c. the face value of the policy on the death of the insured;
- d. the present cash value of the policy;
- e. the date the policy was issued;
- f. the name of the insured;
- g. each date on which a payment was made;
- h. the amount of each payment;
- i. the complete address of the present location of each document or contract of insurance issued to you in connection with or as evidence of the policy;
- j. the full name of the owner of the policy;
- k. the full name, complete address, and telephone number of each person having custody of a copy of the document or contract; and
- l. the complete contents of the policy, copying it verbatim or, if you will do so without a court order, attaching a copy of the policy to your answers. If these policies amount to more than one hundred pages for all of them, you may comply by stating that they may be inspected or will be made available without a court order.

ANSWER:

INTERROGATORY NO. 41: Has any beneficiary designation of any above-described insurance policy been changed in the last five (5) years? If so, for each change please state-

- a. the date on which the beneficiary designation was changed;
- b. the name of the new beneficiary;
- c. the name of the old beneficiary; and
- d. why the change was made.

ANSWER:

INTERROGATORY NO. 42: Do you now have any right to payment of money from any person or entity for any reason, including but not limited to promissory notes, accounts receivables, certificates of deposit, securities, foreign currency, traveler's checks, treasury checks, treasury bills, and savings bonds? If so, for each claim please state-

- a. a complete description of the claim;
- b. the full name and complete address of the debtor;
- c. the amount of the claim; and
- d. whether any suit or action has been brought to reduce the claim to judgment; if so, please state –
 - (1) the title and number of the case;
 - (2) the name, number, and location of the court in which it was filed or is now pending; and
 - (3) the present status of the case.

ANSWER:

INTERROGATORY NO. 43: In the last five (5) years, has any above-described right of you to receive money been assigned or disposed of other than by collection in full? If so, for each such account please state-

- a. the full name of the account;
- b. the kind of disposition;

- c. the date of the disposition;
- d. the full name and complete address of the person or entity taking the account;
- e. the amount of reserve due to you;
- f. the extent to which future accounts receivable were covered; and
- g. the amount of payment received in exchange.

ANSWER:

INTERROGATORY NO. 44: At any time in the last five (5) years, have you disposed of any real or personal property by sale, gift, or other action? If so, for each disposition please state-

- a. a full description of the property disposed of;
- b. the date of the disposition;
- c. the full name and complete address of each person or entity to whom disposition was made;
- d. the payment or other consideration received in exchange;
- e. the manner of disposition (gift, sale, etc.);
- f. the date you acquired the property;
- g. the estimated market value of the property when you acquired it; and
- h. the complete address of the property's present location.

ANSWER:

INTERROGATORY NO. 45: At any time in the last five (5) years, have you made any disposition, by conveyance, transfer, gift, or otherwise, of property with any reservation of rights, benefits, or options for the reacquisition of the property at some future date? If so, for each disposition please state-

- a. a full description of the property involved;

- b. the date of the disposition;
- c. the transferee's full name and complete address;
- d. the nature of the reservation, benefit, or option;
- e. the cost of the property when you acquired it; and
- f. the market value of the property at the time of disposition or the payment or other consideration received in exchange.

ANSWER:

INTERROGATORY NO. 46: Have you in the last five (5) years assigned any thing or right to collect money? If you have, for each assignment please state-

- a. a description of the thing or right assigned;
- b. the date the assignment was made;
- c. the full name and complete address of the assignee; and
- d. the payment or other consideration received in exchange.

ANSWER:

INTERROGATORY NO. 47: At any time in the last five (5) years, have you transferred, conveyed, or assigned any property or any rights in any property under any condition or made any loan or pledged any property to any officer, director, or shareholder, or to any relative, spouse, spouse's relative, friend, or acquaintance of such a person? If so, for each transaction please state-

- a. a complete description of the transaction;
- b. the date of the transaction;
- c. the full name and complete address of each person involved in the transaction; and
- d. the payment or other consideration received or paid by you in exchange.

ANSWER:

INTERROGATORY NO. 48: At any time in the last five (5) years, have you given consideration for any property that has been conveyed or transferred and is now being held for you in the name of some person or other entity? If so, for each occurrence please state-

- a. the full name and complete address of each title holder;
- b. the date the conveyance or transfer was made;
- c. a complete description of each item of property involved; and
- d. the amount of payment or consideration given for the property.

ANSWER:

INTERROGATORY NO. 49: In the last five (5) years, have you suffered any casualty loss from fire, wind, theft, or other cause? If you have, for each loss please state-

- a. a description of the property lost or damaged;
- b. the date of the loss;
- c. the cause, nature, and amount of the loss;
- d. whether the loss was covered by insurance and, if it was, the name of the insurance carrier, the policy number, the policy limits, and whether a claim was filed; and
- e. if a claim was filed, the amount of the claim, the full name and address of the agent who processed it, and how much of the claim was paid.

ANSWER:

INTERROGATORY NO. 50: At any time in the last five (5) years, have you been a party to any contract or other agreement by which you granted an option to any person or other entity to purchase any or all of your assets? If so, for each agreement please state-

- a. the date of the agreement;
- b. where the agreement was made;
- c. the full name and complete address of each person or entity that was a party to the agreement;

- d. the payment or other consideration you received in exchange for the agreement;
- e. the full name and complete address of each person or entity furnishing the consideration;
- f. a complete description of the property covered by the agreement; and
- g. the terms of the agreement, copying it verbatim or, if you will do so without a court order, attaching a copy of the agreement to your answers.

ANSWER:

INTERROGATORY NO. 51: At any time in the last five (5) years, have you made any payment in compromise of a debt? If you have, for each payment please state-

- a. the date of payment;
- b. the debt's original amount and its current amount;
- c. the full name and complete address of the owner of the debt; and
- d. the basis for the debt.

ANSWER:

INTERROGATORY NO. 52: Is any of your property rented, leased, or otherwise in another party's possession? If so, for each such piece of property please state-

- a. a description of the property;
- b. the full name and complete address of the person or entity having possession of the property;
- c. the basis for the third party's possession (lease, rental, etc.); and
- d. the payment or other consideration you received in exchange for the arrangement.

ANSWER:

INTERROGATORY NO. 53: Have you made any payment exceeding \$500.00 to any creditor within the last four (4) months? If you have, for each payment please state-

- a. the date and amount of the payment; and
- b. the full name and complete address of the recipient.

ANSWER:

INTERROGATORY NO. 54: Is any state or federal tax lien filed or outstanding against you? If so, for each lien please state-

- a. the amount of the lien;
- b. whether the tax has been paid;
- c. the name of the governmental agency that filed the lien; and
- d. the date it was filed.

ANSWER:

INTERROGATORY NO. 55: Have you received any notice of a tax deficiency? If you have, for each deficiency please state-

- a. the amount of the alleged deficiency;
- b. the full name and complete address of the governmental agency claiming the deficiency; and
- c. the date of the notice.

ANSWER:

INTERROGATORY NO. 56: At any time in the last five (5) years, have you made any payment as an extension or compromise of a tax claim? If you have, for each claim please state-

- a. the date and amount of each payment; and
- b. the full name and complete address of the governmental agency claiming the deficiency.

ANSWER:

INTERROGATORY NO. 57: Do you have any abstract of judgment filed against you? If so, for each judgment please state-

- a. the date of the judgment;
- b. its amount and how much remains unpaid; and
- c. the name of each county and the volume and page numbers of the record book where the abstract is recorded in each county.

ANSWER:

INTERROGATORY NO. 58: Do you have any financing statement or UCC statement filed against you? If you do, for each statement please state-

- a. the date and place of filing;
- b. the full name and complete address of the party filing the statement;
- c. the amount of the debt to which it pertains;
- d. a complete description of the collateral securing the debt, as shown on the security agreement;
- e. the date of maturity of the debt; and
- f. the complete contents of the statement, copying it verbatim or, if you will do so without a court order, attaching a copy of the statement to your answers.

ANSWER:

INTERROGATORY NO. 59: Does any person or entity now keep records (including but not limited to checkbooks, ledgers, memoranda, other written documents, tape recordings, and computer records) of receipts, disbursements, and other business transactions of you, or have they been kept at any time in the last five (5) years? If so, please attach copies of the records for the last five (5) years if you will do so without a court order; if the records amount to more than one hundred pages for all of them, you may comply by stating that they may be inspected or will be made available without a court order. Further, please state-

- a. the form in which the records are or were kept;
- b. the accounting basis (cash or accrual) used;

- c. the date they were first maintained;
- d. the full name and complete address of each person or entity that prepared them;
- e. the full name and complete address of each person or entity now having custody of them;
- f. the complete address of each location of any such records relating to the last five (5) years; and
- g. whether the records accurately reflect the income reported in your federal income tax returns for each year during which the records were kept.

ANSWER:

INTERROGATORY NO. 60: Has any record of your income, disbursements, or business affairs been stolen or disposed of in the last five (5) years? If so, for each disposition please state-

- a. the nature of the disposition, such as theft or intentional destruction;
- b. the date of the disposition;
- c. the reason for the disposition;
- d. the full name and complete address of the person making the disposition; and
- e. if theft occurred, whether it was reported to the police.

ANSWER:

INTERROGATORY NO. 61: At any time in the last five (5) years, have you employed or used the services of an accountant, bookkeeper, or certified public accountant? If so, for each please state-

- a. the full name and complete address of the person;
- b. the dates during which the services were employed;
- c. a description of the services the person performed;
- d. the reason the person's services were employed; and

- e. the contents of resulting reports, copying them verbatim or, if you will do so without a court order, attaching copies of the reports to your answers. If the reports amount to more than one hundred pages for all of them, you may comply by stating that they may be inspected or will be made available without a court order.

ANSWER:

INTERROGATORY NO. 62: At any time in the last five (5) years, has anyone taken an inventory of your property? If so, for each inventory please state –

- a. the date of the inventory;
- b. the full name and complete address for each person who made the inventory or supervised it;
- c. the full name and complete address of each person or entity having a copy of the inventory;
- d. the total dollar value of the property as stated in the inventory;
- e. the means used to evaluate the inventory;
- f. the reason for making the inventory; and
- g. a complete description of each item of property included in the inventory, copying them verbatim or, if you will do so without a court order, attaching copies of the reports to your answers. If the reports amount to more than one hundred pages for all of them, you may comply by stating that they may be inspected or will be made available without a court order.

ANSWER:

INTERROGATORY NO. 63: Do you or any employee, officer, director, or member of you have any interest in any pension plan, retirement fund, annuity fund, or profit-sharing plan? If so, for each plan please state-

- a. the full name and complete address of the plan's administrator;
- b. the present value of your interest in the plan;
- c. the present value of the interest belonging to any person in any of the above-described categories; and

- d. a description of the terms under which you or any person in any of the above-described categories can receive money or property under the plan.

ANSWER:

INTERROGATORY NO. 64: Has any money, real property, or other personal property heretofore belonging wholly or partly to you been transferred to, or is it in the possession of, any present or former member, employee, agent, officer, or director of you or any relative by blood or marriage, friend, or acquaintance of any of them? If so, for each transaction please state-

- a. a complete description of the transaction;
- b. a complete description of the property involved;
- c. the full name and complete address of each person involved; and
- e. the payment or other consideration you received in exchange.

ANSWER:

INTERROGATORY NO. 65: Are you presently entitled to receive any money from a governmental office, such as a utility deposit, income tax refund, or security deposit? If so, for each payment please state-

- a. the full name and complete address of the office owing the money;
- b. the reason you are owed the money;
- c. the amount owed; and
- d. the date it will be paid.

ANSWER:

INTERROGATORY NO. 66: Have you ever filed a petition in bankruptcy, entered into an assignment for the benefit of creditors, or been a party to a composition arrangement? If so, for each occurrence please state-

- a. the nature of the proceedings or arrangement;
- b. the date the proceeding began or the arrangement was made;
- c. the name, number, and location of any court that was involved; and

- d. the disposition or present status of the proceeding or arrangement.

ANSWER:

INTERROGATORY NO. 67: Has any person or entity ever filed an insolvency proceeding against you, including a state receivership action or a federal bankruptcy proceeding? If so, for each proceeding please state-

- a. the full name and complete address of the person or entity that filed it;
- b. the date it was filed;
- c. the name, number, and location of the court in which it was filed;
- d. the grounds alleged; and
- e. the disposition of the proceeding or its present status.

ANSWER:

INTERROGATORY NO. 68: In the last five (5) years, has any person or entity paid or transferred to you assets in any form, including money, worth more than \$1,000.00? If so, for each transfer please state-

- a. the full name and complete address of the person or entity making the transfer;
- b. the date of the transfer;
- c. a complete description of the assets transferred; and
- d. the value of each asset transferred.

ANSWER:

INTERROGATORY NO. 69: For each expense of yours that recurs on a monthly or other regular basis and exceeds \$5,000.00, please state-

- a. a complete description of the debt or expense;
- b. the amount of each payment and either that this amount is the same for each payment or that this amount is an average for the past year;
- c. the full name and complete address of the recipient of the payments;
- d. whether each debt is paid;

- e. the manner of payment (cash payment, transfer of inventory, etc.); and
- f. if the debt is paid in cash, the full name and complete address of the source from which the cash is obtained.

ANSWER:

INTERROGATORY NO. 70: For each bank or other financial or lending institution with which you have transacted any type of business or maintained any account in the last five (5) years, please state-

- a. the full name and complete address of the institution;
- b. the account or transaction number involved; and
- c. a complete description of the transaction.

ANSWER:

INTERROGATORY NO. 71: Please state all reasons why you have not paid your debt to Plaintiff.

ANSWER:

INTERROGATORY NO. 72: If arrangements for a lump sum settlement cannot be made, please state when you could start making monthly or other periodic payments and how much you are able and willing to pay each month toward satisfying your debt to Plaintiff.

ANSWER:

INTERROGATORY NO. 73: If you cannot start making monthly payments within the next thirty (30) days, please state why not.

ANSWER:

INTERROGATORY NO. 74: Why are you unable or unwilling to pay more than the amounts listed in the answers to question 72?

ANSWER:

Respectfully submitted,

/s/ Jacob B. Kring

Jacob B. Kring

Texas State Bar No. 24062831

HEDRICK KRING, PLLC
1700 Pacific Ave., Suite 4650

Dallas, Texas 75201

Telephone: (214) 880-9600

Telecopier: (214) 481-1844

E-mail: jacob@hedrickkring.com

ATTORNEY FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Plaintiff's Interrogatories in Aid of Judgment to Defendant has been served on the following via certified mail, return receipt requested, on this 1st day of September 2017.

Cimarron County Health Authority *d/b/a* Cimarron Memorial Hospital
100 South Ellis Street
Boise City, Oklahoma 73933

/s/ Jacob B. Kring

Jacob B. Kring